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12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:25-CR-26-TLN
16 Plaintiff,)
17 vs.) **JOINT STIPULATION AND ORDER TO**
18 John Parker, Veronica Brooks,) **CONTINUE STATUS CONFERENCE AND**
19 Xavier Surita,) **EXCLUDE TIME**
20 RAYMUNDO ESCOBAR,)
21 Marcelino Escobar,) Date: April 10, 2025
22 & Devon Nelson) Time: 9:30 A.M.
23 Defendants.) Judge: Hon. Troy L. Nunley, Chief District Judge
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28)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Emily Sauvageau, counsel for Plaintiff; John Parker, through counsel Tasha Chalfant; Veronica Brooks, through counsel Danica Mazenko; Xavier Surita, through counsel Olaf Hedberg; Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Raymundo Escobar; Marcelino Escobar, through counsel Clemente Jiménez; and Devon Nelson, through counsel Phil Cozens, that the status conference, currently set for April 10, 2025, **may be continued to May 15, 2025, at 9:30 a.m.** with time between the dates excluded, as detailed below. The parties stipulate as follows:

1. A superseding indictment charging the above-listed defendants was filed on February 06, 2025. Dkt. 58.

- 1 2. The government has produced approximately 1,500 items of discovery (which are
- 2 a mix of documents and media files) to below-signed defense counsel, as well as
- 3 additional discovery pertinent to each of their individual clients.
- 4 3. Undersigned defense counsel represent that they require additional time to
- 5 investigate this case, conduct legal research, consult with their clients, explore
- 6 potential resolutions, and otherwise prepare for trial.
- 7 4. Undersigned defense counsel believe that failure to grant the requested continuance
- 8 would deny them the reasonable time necessary for effective preparation, taking
- 9 into account the exercise of due diligence.
- 10 5. The government does not object to the continuance.
- 11 6. The parties stipulate that the ends of justice served by granting the requested
- 12 continuance outweighs the best interest of the public and the above-listed
- 13 defendants in a speedy trial, and respectfully request the Court so to find.
- 14 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (the Speedy Trial
- 15 Act), the parties request that the time period between April 10, 2025 and May 15,
- 16 2025 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv)
- 17 (Local Code T-4), because it would result from a continuance granted by the Court
- 18 at the defense's request, based on a finding that the ends of justice served by
- 19 granting the continuance outweighs the best interest of the public and the
- 20 defendants in a speedy trial.

21 The parties therefore respectfully request this Court to adopt the parties' stipulation in its
22 entirely as its Order.

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2 Date: April 7, 2025

Respectfully submitted,

3 /s/ Tasha Chalfant
4 Attorney for Defendant
JOHN KEVIN PARKER

5 Date: April 7, 2025

6 /s/ Danica Mazenko
Attorney for Defendant
VERONICA BROOKS

7 Date: April 7, 2025

8 /s/ Olaf Hedberg
Attorney for Defendant
XAVIER SURITA

9 HEATHER E. WILLIAMS
Federal Defender

10 Date: April 7, 2025

11 /s/ Christina Sinha
CHRISTINA SINHA
12 Assistant Federal Defender
13 Attorneys for Defendant
RAYMUNDO ESCOBAR

14 Date: April 7, 2025

15 /s/ Clemente Jiménez
16 Attorney for Defendant
MARCELINO ESCOBAR

17 Date: April 7, 2025

18 /s/ Phil Cozens
Attorney for Defendant
DEVON NELSON

19 Date: April 7, 2025

20 MICHELE BECKWITH
21 Acting United States Attorney

22 /s/ Emily Sauvageau
EMILY SAUVAGEAU
23 Assistant United States Attorney
24 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: April 7, 2025



Troy L. Nunley
Chief United States District Judge